

1 Leigh T. Goddard (NV Bar 6315)  
2 Daniel I. Aquino (NV Bar No. 12682)  
3 MCDONALD CARANO LLP  
4 100 W. Liberty St. Tenth Floor  
5 Reno, NV 89501  
6 Telephone: 775-788-2000  
7 [lgoddard@mcdonaldcarano.com](mailto:lgoddard@mcdonaldcarano.com)  
8 [daquino@mcdonaldcarano.com](mailto:daquino@mcdonaldcarano.com)  
9 [tteegarden@mcdonaldcarano.com](mailto:tteegarden@mcdonaldcarano.com)

10 *Attorneys for KPG Investments, Inc.*  
11 *and Kendalle Getty*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KPG INVESTMENTS INC., a Nevada Case No.:  
15 corporation; KENDALLE GETTY, an individual, 3:22-cv-00236-ART-CLB

16 Plaintiffs,

17 v.

18 MARLENA SONN, an individual; AND DOES 1-  
19 20,  
20 Defendant.

21 MARLENA SONN,

22 Plaintiff,

23 v.

24 KENDALLE P. GETTY, as Trustee of the  
25 Pleiades Trust and as an individual, KPG  
26 INVESTMENTS, INC., as Trustee of the  
27 Pleiades Trust, ALEXANDRA SARAH GETTY,  
as Trustee of the Pleiades Trust and as an  
individual, ASG INVESTMENTS, INC., as  
Trustee of the Pleiades Trust, MINERVA  
OFFICE MANAGEMENT, INC., and ROBERT  
L. LEBERMAN,

Defendants.

Consolidated with:  
3:22-cv-00323-ART-CLB

**STIPULATION TO EXTEND  
CASE DEADLINES  
AND  
ORDER**

**(Second Request)**

1 KPG Investments Inc., Kendalle Getty, ASG Investments, Inc., Alexandra Sarah  
2 Getty, Minerva Office Management, Inc., Robert L. Leberman and Marlena Sonn  
3 (collectively, the "Parties"), by and through their respective counsel of record, agree  
4 and stipulate to extend case deadlines to allow the parties to memorialize the terms  
5 of their settlement.

6 1. On August 28, 2023, the Parties participated in a mediation with the  
7 Honorable David Wall, and subsequently reached an agreement as to material  
8 terms.

9 2. On September 6, 2023, the Parties filed a Stipulation to Extend Case  
10 Deadlines (ECF No. 118) to inform the Court of the settlement and to extend the  
11 immediate case deadlines while they focused on documenting the settlement terms.

12 3. On September 7, the Court entered its Order Granting Stipulation to  
13 Extend Case Deadlines. (ECF No. 119.)

14 4. Since that time, the Parties have continued to work toward the final  
15 settlement documents, but the documents have not yet been finalized. Accordingly,  
16 the Parties must seek a second extension of the case deadlines. However, rather  
17 than proposing a new schedule, the Parties agree that it is appropriate to vacate the  
18 existing case deadlines and schedule a Case Management Conference with the  
19 Court in approximately 60 days.

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

5. The Parties agree that if the settlement is not finalized, they will file a Case Management Report to the Court seven (7) days before the Case Management Conference, and new case deadlines should be set at the conference.

**IT IS SO STIPULATED AND AGREED**, November 6, 2023.

McDONALD CARANO LLP

/s/ Leigh Goddard  
Leigh T. Goddard  
Daniel I. Aquino  
100 W. Liberty St., Tenth Floor  
Reno, Nevada 89501  
(775) 788-2000  
[lgoddard@mcdonaldcarano.com](mailto:lgoddard@mcdonaldcarano.com)  
[daquino@mcdonaldcarano.com](mailto:daquino@mcdonaldcarano.com)

*Attorneys for KPG Investments Inc.  
and Kendalle Getty*

THE GUNDERSON LAW FIRM

/s/ Mark Gunderson  
Mark H. Gunderson  
3895 Warren Way  
Reno, NV 89509  
(775) 829-1222  
[mgunderson@gundersonlaw.com](mailto:mgunderson@gundersonlaw.com)

*Attorney for Minerva Office  
Management, Inc. and Robert L.  
Leberman*

ROGER WENTHE, PLLC

/s/ Adam Pollock  
Roger W. Wenthe  
2831 St. Rose Pkwy. # 200  
Henderson, NV 89052  
(702) 971-0541  
[Roger.Wenthe@gmail.com](mailto:Roger.Wenthe@gmail.com)

Adam Pollock  
Christopher Leung  
POLLOCK COHEN LLP  
111 Broadway, Suite 1804  
New York, NY 10006  
[adam@pollockcohen.com](mailto:adam@pollockcohen.com)

*Attorneys for Marlena Sonn*

PAUL HASTINGS, LLP

/s/ Ryan Derry  
Ryan D. Derry  
101 California Street, 48<sup>th</sup> Floor  
San Francisco, CA 94111  
[ryandarry@paulhastings.com](mailto:ryandarry@paulhastings.com)

Alice Campos Mercado  
LEMONS, GRUNDY & EISENBERG  
Alice Campos Mercado  
6005 Plumas St., 3rd Floor  
Reno, NV 89519  
(775) 786-6868  
[acm@lge.net](mailto:acm@lge.net)

*Attorney for Alexandra Sarah Getty  
and ASG Investments Inc*

UNITED STATES MAGISTRATE JUDGE

DATED